

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CAPITAL TRUST HOLDING AG,

Plaintiff,

-against-

RAINMAKER INTERNATIONAL, INC.,

Defendant.

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Index No.: 07 Civ. 7318  
Hon. Colleen McMahon

**NOTICE OF CROSS-  
MOTION**

PLEASE TAKE NOTICE, that on the declaration of Hany Salem, dated September 25, 2007, the summons and complaint, and on all other proceedings had herein, the undersigned counsel for Plaintiff will cross-move this Court, before the Honorable Colleen McMahon, Courtroom 21B, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time to be set by the Court, for an Order pursuant to Fed. R. Civ. P. 65(a) preliminarily enjoining the Defendant from selling or otherwise transferring Plaintiff's four million non-collateralized shares of Boulder Steel Ltd. currently in Defendant's possession or control, and for such other and further relief as the Court deems just and proper.

Dated September 26, 2007

WUERSCH & GERING LLP

By: 

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